mission
CONSULTING
THE STRATEGIC SERVICES GROUP OF HESSE, STOBBE & O'SULLIVAN, LLC

August 27, 2007

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Ex Parte
CG Docket No. 03-123: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities

Dear Ms. Dortch:

While at the TDI Conference in San Mateo, California, on August 22, 2007, Bill Stobbe and Judy Viera of Mission Consulting met with Greg Hlibok of the FCC's Consumer and Governmental Affairs Bureau. Mission Consulting described the multi-vendor TRS architecture used in California, including the Network Management Services (NMS) component for routing and reporting database functions. Mission Consulting also suggested that equivalent functions of the NMS architecture could potentially apply to national TRS reporting, and may offer a potential numbering solution for Video Relay Service and other IP-enabled TRS services. Additional similar information was exchanged on August 25, 2007 while at the TDI conference.

Excerpts from the California Relay Service (CRS) RFP, created by Mission Consulting, were provided, along with two sample report formats and a network diagram, and a brochure about Mission Consulting. Copies of these items are enclosed.

Sincerely,

Bill Stobbe

Bill Stobbe, Partner

Encl: CRS RFP Section 4 excerpt
CRS report excerpts
CRS network diagram
Mission Consulting brochure

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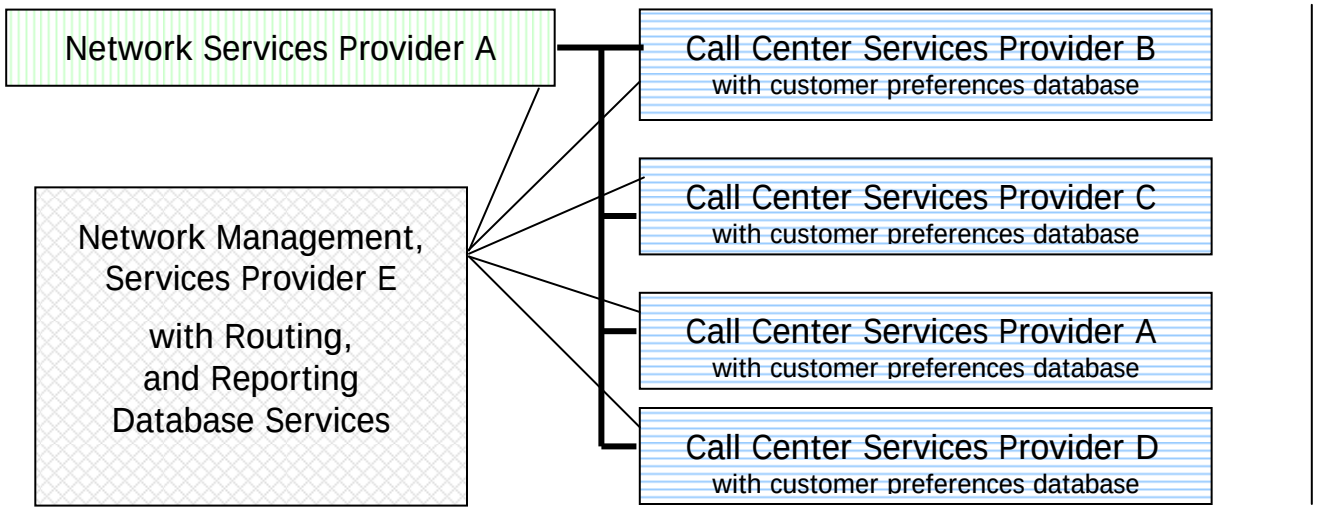
SECTION 4
PROPOSED SERVICES[1]

4.1. SERVICE COMPONENTS

It is the intent of the DDTP to no longer require CRS providers to offer both network services and call center relay services. The DDTP wishes to distribute service loads into three separately bid components. Operating together these separately bid and awarded service components will comprise the California Relay Service. The desired effect will be to place the operational elements of CRS with the responding organizations most qualified in each operational element. For example, the DDTP will no longer require companies whose expertise is the provision of network services to establish call centers or hire and train relay agents. The three separately bid service components, which are included in this RFP, are:

1. Toll-free and Outbound **Network Services** (NS)
2. **Call Center Services** (CCS)
3. **Network Management Services** (NMS)

It is the intent of the DDTP that only one bidder will be awarded the network services (NS), while not more than four (4) bidders will be selected to provide the CRS call center services (CCS). The third operational component, network management services (NMS), will be awarded to a single bidder, who may not be awarded either NS or CCS components.



It is the intent of the DDTP that bidders may offer toll-free and network services, as well as CRS call center services. However, each of these two operational components must be offered separately and independently of one another. If awarded, separate contracts will be issued for each component as an outsourced service. Each contractor shall be fully responsible for their performance, and that of their subcontractors and suppliers that provide any portion of CRS. (See RFP section 5.4.)

[1] Portions of this section are taken from ATIS/NIIF-0008, Telecommunications Relay Service (TRS) – Technical Needs, available at www.atis.org (see RFP Section 3.2.)

4.2. CALL FLOW

There will be many different possible combinations of call types, such as TTY to voice, ASCII to voice, voice to VRS, etcetera. Of these many possibilities, three possible CRS call flow scenarios are illustrated below.

In illustration 4.1, a TTY caller uses CRS to call and talk to a voice user. The TTY caller first places an inbound 800 (toll-free) call to the relay center. The call originates at a TTY connected to a Local Exchange Company (LEC) central office. The call is then routed via the public switched network to the Network Service Provider's (NSP) nearest point of presence. The Network Management System (NMS) actively monitors the status of the NSP's network. When the call reaches the NSP's network, the NS sends a route request to the NMS. Using the originating telephone number (ANI) as the reference point, the NMS looks in its 711 routing database to ascertain instructions for routing the call. The NMS instructs the NSP's network to route the call to the TTY circuit address for Call Center "C" which it does. Note that the call never travels to the NMS. The NMS only provides routing instructions to the NSP. When the call is delivered to the Call Center the CCS vendor checks its customer preference database (also called caller profile database) for call setup and handling preferences. When the Call Centers' Communications Assistant (CA or relay agent) receives the call, the CA obtains from the caller the number that the caller wants to reach. The CA then places a separate simultaneous outbound call. If the CCS database did not instruct the CA to place the outbound call over a specific carrier and there was no such request from the caller, the call is placed to the called party via a carrier of the CCS's choice, in this illustration depicted as the NSP. When the call is answered the CA announces the call and begins to relay the conversation between the TTY caller and the voice user.

CRS illustration 4.1:

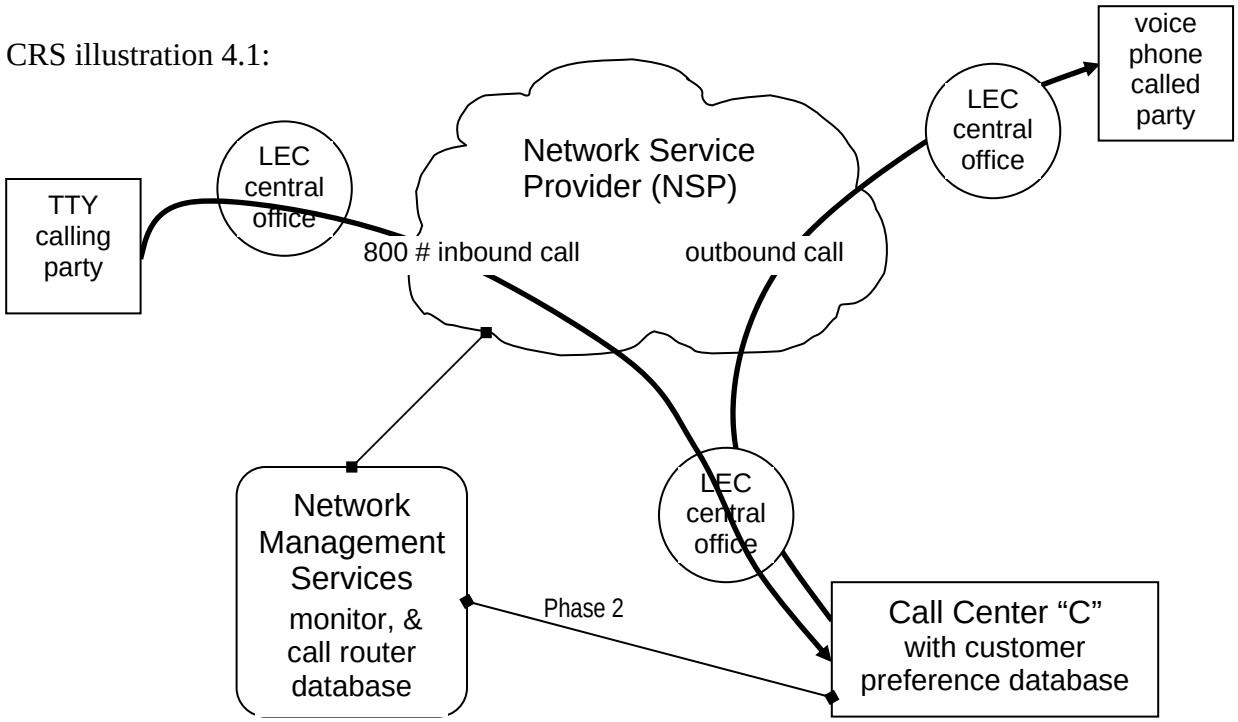
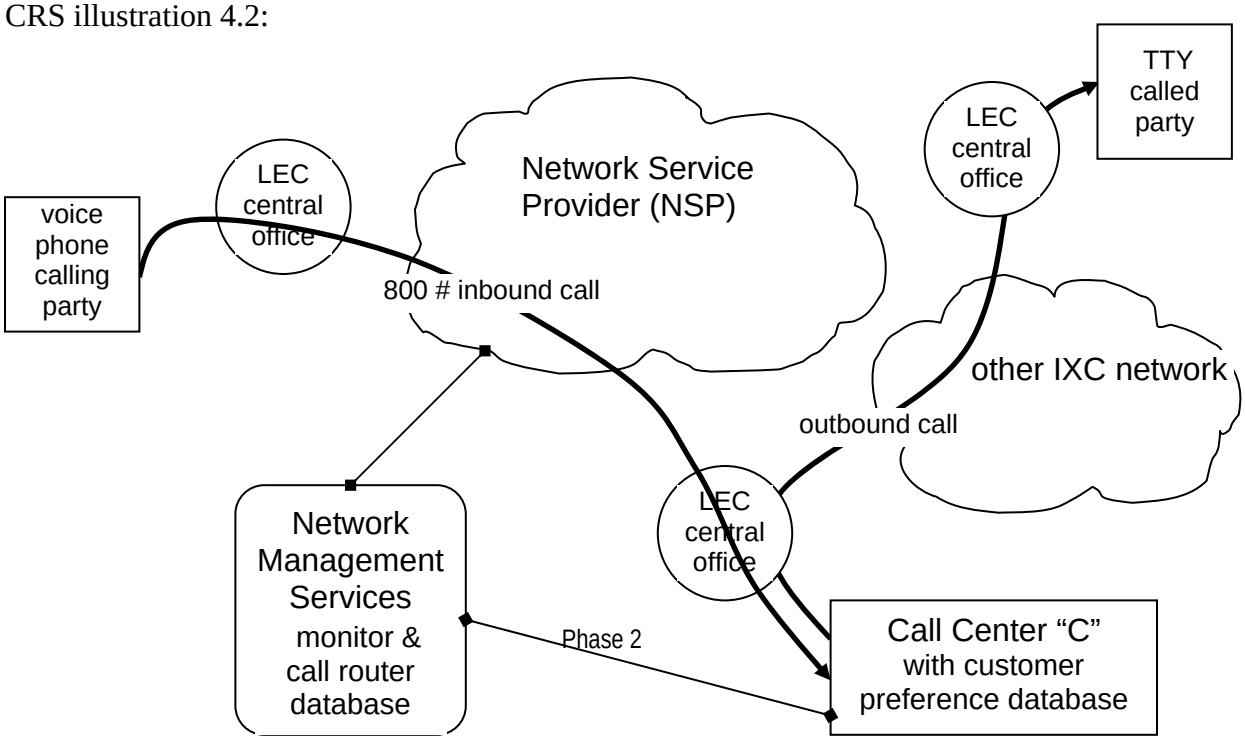


Illustration 4.2 is similar to 4.1 except the call originates from a voice user and is directed to a TTY user, and a different outbound long distance carrier is used. The call is routed to the Call Center in the same manner as in the first illustration except that the call is directed to a voice port at the Call Center. However, in this scenario since the called party is a TTY, the CCS initiates an inquiry to its customer preference database to determine if the called number has special relay call handling preferences such as hearing carry over (HCO) or voice carry over (VCO). In addition, in this scenario the caller has specified, either in the CCS vendor's customer database or as a direct request to the CA, that they want the outbound call to be placed over an inter-exchange carrier (IXC) other than the CRS NSP. The Call Center CA acquires a circuit associated with the desired IXC and continues to process the call. When answered, the CA announces the call and begins to relay the conversation between the TTY caller and the voice user.

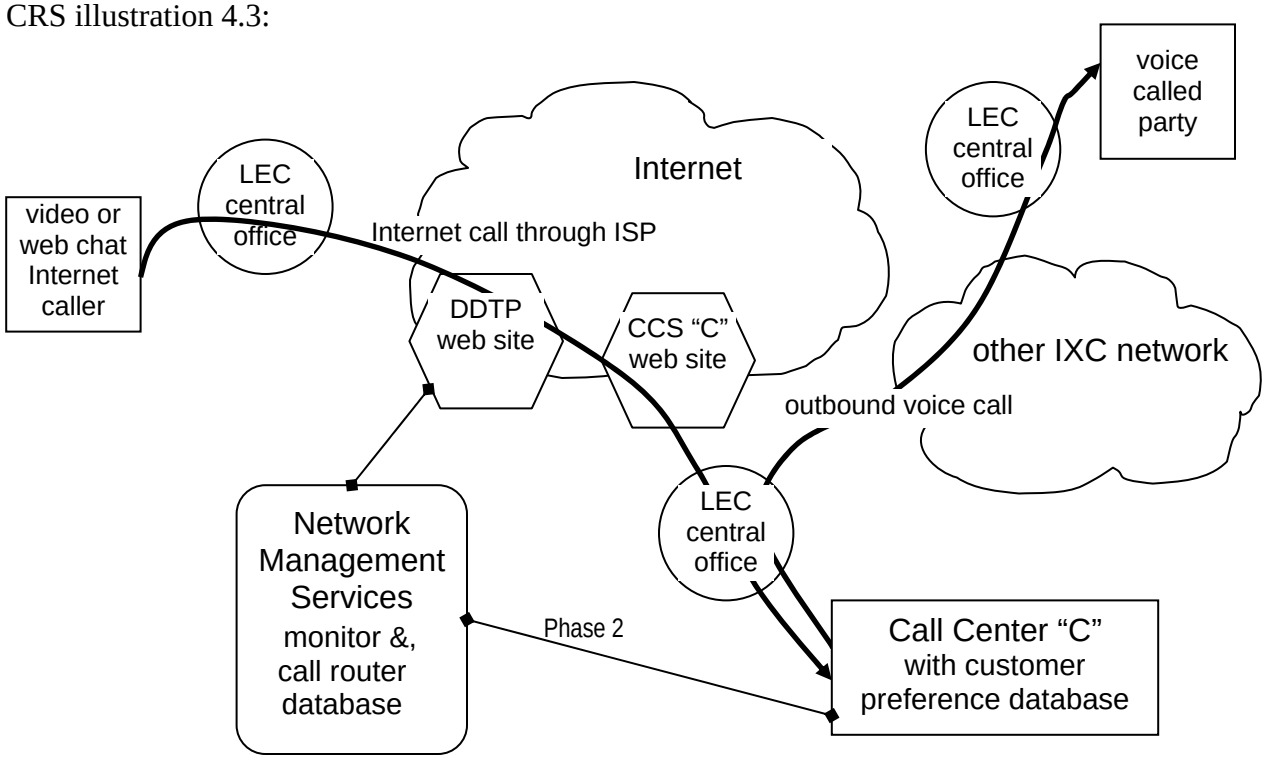
CRS illustration 4.2:



The third illustration, 4.3. below, depicts a caller using the Internet to place a desktop video or web chat CRS call to a call center for relay to a voice called party. In this scenario, the call is placed through the local LEC to the caller's Internet Service Provider (ISP) and then via the Internet to the DDTP's web site. These calls are routed via instructions from the NMS to a CCS provider's web site and from there to the CCS providers' video relay or web chat relay equipped platform. On a video relay call, the CCS agent converses with the caller in ASL, signed or oral transliteration, and establishes

and relays with the outbound called party in voice. Note that the FCC has presently authorized payment from interstate TRS funds to qualified relay providers for FCC compliant VRS and IP-based relay services (e.g., ISDN and IP video, Web chat). When individual states including California become responsible for payment directly to the CCS Providers for the VRS and WCR, all inbound Internet CRS calls may be required to go to the DDTP's web site to receive further routing instructions. As this possibility is not anticipated until well after the CRS RFP award and implementation, the DDTP's decision whether or not to invoke this requirement will in part be dependent upon the status of Federal and California mandates, CRS vendor capabilities, and CRS user conventions at the time. See RFP Sections 6.3.27.(4.) and 6.3.28.(2.)

CRS illustration 4.3:



4.3. GENERAL REQUIREMENTS

4.3.1. Carrier of Choice

The regulation prescribing equal access for TRS has been interpreted to require that the TRS provider offer the TRS user the ability to designate the carrier to transport the outbound call. Accordingly, the TRS provider must establish the technical capability and the administrative procedures to route the call to the designated transport carrier. Similarly, the transport carrier must be able to recognize the TRS call, complete the call to its destination, and obtain sufficient call detail information to accurately rate and bill the call. With such an arrangement, the established connection will link the calling party to the called party, through the CCS CRS platform and the facilities of the transport carrier. The Communications Assistant (CA) of the CCS provider will provide the relay function.

	DDTP Only	CCS									711 Choice Forms		
		Inbound Traffic						Outbound Traffic					
	Calls Sent to Providers	Total Calls Presented (DDTP & Dedicated)	Calls Answered	% Abandoned	Overflowed Calls	ASA Events	% Blocked	Completed Outbound Calls	Conversation Time (minutes)	Average Conversation Time	Total 711 Forms	New 711 Forms	Choice Traffic (Calls)
Jan-05													
Feb-05													
Mar-05													
Apr-05													
May-05													
Jun-05													
Jul-05													
Aug-05	424,516	513,616	499,115	2.8%	231	92	0.00%	298,911	1,168,585	3.9	533	49	10,050
Sep-05	370,808	469,187	458,404	2.5%	211	108	0.00%	135,049	639,434	4.7	582	47	9,793
Oct-05	377,871	348,918	314,377	9.9%	361	38	0.00%	284,081	1,140,243	2.3	629	27	10,525
Nov-05	349,855	345,301	307,662	10.9%	1,032	38	0.00%	254,540	946,237	3.7	656	29	11,103
Dec-05	380,351	499,782	463,354	7.3%	48	56	0.00%	242,588	1,080,239	4.5	695	39	12,432
Jan-06	398,423	501,972	470,403	6.3%	850	51	0.00%	238,176	1,098,027	4.6	731	30	11,964
Feb-06	330,037	455,369	447,415	1.7%	19	37	0.00%	206,646	944,538	4.6	762	32	10,683
Mar-06	364,997	585,481	576,453	1.5%	12	22	0.00%	251,905	1,067,736	4.2	805	41	12,456
Apr-06	348,555	448,988	438,588	2.3%	-	33	0.00%	228,949	744,842	3.3	838	34	12,280
May-06	344,195	404,188	395,589	2.1%	-	19	0.00%	234,543	979,935	4.2	724	31	12,559
Jun-06	329,925	369,776	361,540	2.2%	-	31	0.00%	230,825	939,526	4.1	954	66	12,376
Jul-06	322,740	359,377	351,100	2.3%	-	37	0.00%	230,766	966,476	4.2	511	32	13,221
Aug-06	309,270	342,359	334,803	2.2%	-	40	0.00%	222,773	832,868	3.7	1,042	33	13,867
Sep-06	286,461	316,532	306,089	3.3%	-	79	0.00%	203,595	855,774	4.2	1,091	37	14210
Oct-06	290,479	324,254	314,518	3.0%		42	0.00%	204,230	856,987	4.2	1,153	53	13,765
Nov-06	278,554	302,090	302,090	2.8%	-	25	0.00%	195,156	820,258	4.2	1,188	30	13,620
Dec-06	285,550	308,128	300,649	2.4%		30	0.00%	197,395	822,292	4.2	1,230	33	15,151
Jan-07													
Feb-07													
Mar-07													
Apr-07													
May-07													
Jun-07													
Jul-07													
Aug-07													
Sep-07													
Oct-07													
Nov-07													
Dec-07													

Color Code:				
	1.5 - 3%	1 - 100	31 - 60	1 - 2%
	3.1 - 4.5%	101 - 500	61 - 90	2 - 3%
	> 4.5%	> 500	> 90	> 3%

(ver. 1.0)

CRS Dashboard Report

The Dashboard Report is intended to provide a simple overview (snapshot) of the quality of the CRS services. Various elements in the report may be highlighted to indicate that they are outside of some predetermined norm.

Dec 06

	DDTP Only	CCS								
		Inbound Traffic						Outbound Traffic		
	Calls Sent to Providers	Total Calls Presented (DDTP & Dedicated)	Calls Answered	% Abandoned	Overflowed Calls	ASA Events	% Blocked	Completed Outbound Calls	Conversation Time (minutes)	Average Conversation Time
Totals:	**285,550**	**319,292**	**311,813**	**2.3%**	**7**	**30**	**0.00%**	**197,853**	**823,118**	**4.2**
MCI (35.59%)	**106,880**	**(34.5%) 110,301**	**107,546**	**2.5%**	**0**	**16**	**0.00%**	**75,667**	**314,382**	**4.2**
Voice	7,974	1,551	1,535	1.0%			0.00%	9,730	38,121	3.9
TTY	23,562	38,604	38,283	0.8%			0.00%	62,691	258,370	4.1
ASCII	13	16	16	0.0%			0.00%	136	250	1.8
STS	412	2,390	2,325	2.7%			0.00%	2,264	14,053	6.2
Spanish	439	1,815	1,792	1.3%			0.00%	846	3,588	4.2
711	74,480	65,925	63,595	3.5%			0.00%			
Nordia (28.75%)	**78,906**	**(23.6%) 75,621**	**73,715**	**2.5%**	**0**	**6**	**0.00%**	**50,429**	**181,779**	**3.6**
Voice	6,258	6,814	6,753	0.9%			0.00%	12,616	35,358	2.8
TTY	17,973	20,018	19,858	0.8%			0.00%	36,649	141,372	3.9
ASCII	8	11	11	0.0%			0.00%	1	7	7.0
STS	164	292	279	4.5%			0.00%	202	1,012	5.0
Spanish	367	829	828	0.1%			0.00%	961	4,030	4.2
711	54,136	47,657	45,986	3.5%			0.00%			
Sprint (35.66%)	**99,764**	**(41.7%) 133,370**	**130,552**	**2.1%**	**7**	**8**	**0.00%**	**71,757**	**326,957**	**4.6**
Voice	7,727	12,733	12,557	1.4%			0.00%	9,101	34,233	3.8
TTY	22,381	52,788	51,864	1.8%			0.00%	59,776	279,157	4.7
ASCII	10	48	39	18.8%			0.00%	9	10	
STS	208	505	497	1.6%			0.00%	250	1,433	5.7
Spanish	438	3,274	3,242	1.0%			0.00%	2,621	12,124	4.6
711	69,000	64,022	62,353	2.6%		-	0.00%			
(% of Allocated Traffic)		(% of All Traffic)								

Color Code:				
	1.5 - 3%	1 - 100	11 - 20	1 - 2%
	3.1 - 4.5%	101 - 500	21 - 30	2 -3%
	> 4.5%	> 500	> 30	> 3%

711 Choice Forms				
	Total 711 Forms	New 711 Forms	Traffic (Calls)	
	1,230	**33**		**15,151**
MCI	**604**	**15**		**10,645**
Voice	51	2		556
TTY	496	11		9,505
ASCII	2			
STS	28			573
Spanish	12			
711	15	2		11
Nordia	**88**	**4**		**1,166**
Voice	17	1		55
TTY	53	2		816
ASCII				
STS	5	1		71
Spanish	9			224
711	4			
Sprint	**332**	**10**		**3,340**
Voice	56			217
TTY	247	10		3,068
ASCII				
STS	9			3
Spanish	8			1
711	12			51
No Provider Choice:	206	4		

Mission Consulting

The firm was established in 1991 by William Stobbe and Andrew Hesse. After working with the partners on projects over several years, William O'Sullivan merged his established consulting practice with the firm. In 2003, Mr. Hesse retired from the firm; however, he remains available as Partner Emeritus.

Mission Consulting employs a staff of seasoned professionals to assist States with their TRS planning, evaluation, implementations, analysis and regulatory issues.

Mission Consulting is completely independent of any TRS providers or equipment suppliers. We maintain high ethics and freedom of conflicts of interest.

Our Mission Statement

Mission Consulting is dedicated to providing uncompromised professional consulting services. In order to assist our clients achieve their goals and objectives, we shall remain independent of financial relationships with vendors, while delivering personalized services and informed advice, on schedule, within budget, and in accordance with applicable guidelines and regulations, the industry's best practices and the highest standard of fiduciary responsibility.

mission consulting

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mission consulting

...providing uncompromised professional consulting service...

Hesse, Stobbe & O'Sullivan, LLC

Permit us to introduce ourselves...

...We are Mission Consulting, a professional consulting firm with an emphasis on personalized service and the application of telecommunications and information technologies resources to resolve operational challenges and improve program efficiency.

- Highly professional technical backgrounds, carefully matched to client and project needs.
- A personal commitment to quality by every project participant.
- Team member project synergy that is professional, creative and accountable to the client's needs.
- A client-based focus and the ability to quickly respond to subtle, yet often critical, evolving client needs with uncommon flexibility.
- Mature management skills including the ability to work with and facilitate communications between executive level client managers and managers of other organizations.
- Multi-state TRS experience since 1987.
- Past appointment to the FCC's Consumer Advisory Committee, plus TRS and Advanced Technologies subcommittees. Past staff service on the Interstate TRS Fund Advisory Council.

Telecommunications Relay Service (TRS)

Our services include working with you on all aspects of TRS (VRS, STS, IP, TRS, etc...)

Requests for Proposals: Provide guidance and implementation support to develop cost-effective single or multi-vendor TRS in compliance with your state's procurement requirements. *Objective: TRS Administrator has access to strategic planning for the RFP by professionals seasoned with TRS experience.*

TRS Quality Assurance: Comprehensive independent technical and operational audits of vendor compliance and call quality using standardized measures. *Objective: TRS Administrator knows how well vendors are performing.*

TRS Vendor Reporting and Invoicing: Customized monthly data reporting and invoicing forms and procedures for use by vendors. *Objective: TRS Administrator is able to track performance, and make projections on usage and costs.*

Improved Technology: Evaluation of cost-effective and timely deployment of new and emerging technologies that hold promise for improving the TRS experience for users.

Regulatory Alerts and Analysis: Alerts, interpretation and independent analysis of proposed and final FCC regulations impacting TRS from the perspective of TRS administrators.

FCC Certification: Review and documentation of State TRS programs for FCC certification.

Clients

The following is a sampling of agencies that have hired Mission Consulting and its principals:

STATE TRS PROGRAMS:

- California Deaf and Disabled Telecommunications Program
- California Public Utilities Commission, Communications Division
- Arizona Commission for the Deaf and Hard of Hearing
- New Mexico Commission for the Deaf and the Hard of Hearing

OTHER CALIFORNIA STATE GOVERNMENT AGENCIES:

- Public Utilities Commissions
- Department of Veterans Affairs
- Department of General Services
- Department of Insurance
- Department of Justice
- Unemployment Insurance Appeals Board
- Integrated Waste Management Board
- Department of Fish and Game
- Secretary of State
- State Controller's Office
- Department of Transportation
- Department of the Highway Patrol
- Department of Parks and Recreation
- Health and Welfare Agency Data Center
- Department of Health Services
- Department of Information Technology
- Department of Consumer Affairs
- Employment Development Department

FEDERAL GOVERNMENT:

- U.S. Courts, Ninth Circuit

POLITICAL SUBDIVISIONS:

- Various Counties and Cities